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*Attorneys for Plaintiff  
Jorns & Associates, LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

JORNS & ASSOCIATES LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2:23-cv-247-KHR
	)	
WCMS MEDIA LLC and JESS E. ROGERS, SR.,	)	
	)	
Defendants.	)	
_____	)	

**PLAINTIFF JORNS & ASSOCIATES LLC'S COMBINED MOTION TO STRIKE AND  
PARTIAL MOTION TO DISMISS AMENDED COUNTERCLAIM**

Pursuant to Fed. R. Civ. P. 12(f) and 12(b)(6), Plaintiff Jorns & Associates LLC (“Plaintiff” or “Jorns”), by and through undersigned counsel, respectfully submits this Combined Motion to Strike and Motion to Dismiss in Part Defendants WCMS Media LLC’s and Jess E. Rogers, Sr.’s (collectively, “Defendants”) Amended Answer and Counterclaim (“Am. Countercl.”) (ECF No. 36). Specifically, Jorns moves this Court to strike the paragraphs under “Overview” and paragraphs 69-87 and 89-90 from the Amended Counterclaim and dismiss Defendant’s claim for breach of the implied covenant of good faith and fair dealing for failure to state a claim.

For the reasons set forth in its accompanying Memorandum of Law, Jorns respectfully requests that this Court GRANT its Motion, strike the above-referenced paragraphs, and dismiss Defendants’ claim for breach of the implied covenant of good faith and fair dealing.

Respectfully submitted this 6th day of May, 2024.

Respectfully submitted,

By: /s/ Zane A. Gilmer

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 6<sup>th</sup> day of May, 2024, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following counsel of record:

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